

"LET'S SUMMARIZE THE HAZARDOUS WASTE REGULATIONS"

Hazardous Waste Handler Seminar

New Jersey State Police Building, Robbinsville, NJ

Prepared by: John Dotterweich

Environmental Specialist 3

Bureau of Hazardous Waste Compliance & Enforcement

Northern Regional Office - Cedar Knolls, NJ

RCRA MADE EASY?

WHAT IS RCRA?

- **R**esource
- **C**onservation &
- **R**ecovery
- **A**ct

WHAT IS RCRA?

- **Our nations primary law governing the disposal of solid and hazardous waste**
- **Congress passed on October 21, 1976**
- **Addressed increasing problem of municipal and industrial waste**

RCRA GOALS

- **Protecting human health and the environment from the hazards of waste disposal**
- **Conserving energy and natural resources**
- **Reducing the amount of waste generated**
- **Ensuring wastes are managed in an environmentally-sound manner**

CRADLE TO GRAVE

RCRA REGULATIONS

SUMMARY SHEET

REQUIREMENTS	CESQG Conditionally Exempt Small Quantity Generator [261.5]	SQG Small Quantity Generator	LQG Large Quantity Generator
1) Monthly Generation Limits	≤ 220 lbs haz. waste &/or ≤ 2.2 lbs acute haz. waste *	>220 lbs but <2200 lbs haz. waste & ≤2.2 lbs acute haz. waste * [262.34(d)]	≥2200 lbs haz. waste or >2.2 lbs acute haz. waste *
2) Accumulation Quantity Limits	≤ 2200 lbs haz. waste &/or ≤ 2.2 lbs acute haz waste onsite	≤13,200 lbs haz. waste & ≤2.2 lbs acute haz waste onsite [262.34(d)]	No limit
3) Accumulation Time Limits	Unlimited	180 days [262.34(d)], 270 days if receiving facility >200 miles [(e)], extensions granted? [(f)]	90 days [262.34(a)], extensions granted? [262.34(b)]
4) EPA ID Number Required	No - voluntary (See NIX program information)	Yes - Contact: Region II USEPA 212-637-4106 [262.12]	Yes - Contact: Region II USEPA 212-637-4106 [262.12]
5) Hazardous Waste Manifest Required	No - Voluntary (See NIX program information)	Yes - unless waste is reclaimed pursuant to 262.20(e)(1)	Yes [262.20]
6) Manifest Copy Retention	None - voluntary	3 years [262.40(a)]	3 years [262.40(a)]
7) Exception Reporting (failing to receive copy of manifest with TSDF operator signature)	None	None - but within 60 days generator must submit copy of manifest with note that signed TSDF copy is missing [262.42(b)]	1) generator must contact initial transporter or the TSDF operator within 35 days of shipping date [262.42(a)] 2) generator must submit written exception report within 45 days of shipping date to NJDEP [262.42(a)]
8) Land Disposal Restriction notification/certification accompanying shipments	None	Required for certain haz. wastes. Keep your copy for 3 years [268.7]	Required for certain haz. wastes. Keep your copy for 3 years [268.7]
9) Biennial Report	None	None [262.44]	Submitted on each even year to report on manifest activity for previous odd year [262.41]
10) Inspections	None	1) Weekly for haz. waste storage containers [265.174] 2) Daily /weekly for haz. waste storage tanks [265.201(c)]	1) Weekly for haz. waste storage containers [265.174] 2) Daily/bimonthly/yearly for haz. waste storage tanks (log required) [265.195]
11) Haz. Waste Training	None	Basic - waste handling familiarization & emergency procedures (no drills required) [262.34(d)(5)(iii)]	Full training (no drills required) [265.16]
12) Preparedness & Prevention	None	Familiarize fire, police, hospital & have emergency response contractor agreement (formal fire inspection not required) [265.30-37]	Familiarize fire, police, hospital & have emergency response contractor agreement (formal fire inspection not required) [265.30-37]
13) Contingency Plan	None	Basic plan - By the phone: Emer. Coord., name & #, fire dept. #, & local. of fire ext. & alarm & spill equipment [262.34(d)(5)(ii)]	Complete plan [265.50-56]

GENERATOR CATEGORIES

- **CESQG:**
Conditionally Exempt Small Quantity Generator
- **SQG:**
Small Quantity Generator
- **LQG:**
Large Quantity Generator

MONTHLY GENERATION LIMITS

- **CESQG:**
 - ≤ 220 lbs. hazardous waste, and/or
 - ≤ 2.2 lbs. acute hazardous waste
- **SQG:**
 - > 220 lbs. but $< 2,220$ lbs. hazardous waste, and
 - ≤ 2.2 lbs. acute hazardous waste

MONTHLY GENERATION LIMITS

- **LQG:**
 - $\geq 2,220$ lbs. hazardous waste, or**
 - > 2.2 lbs. acute hazardous waste**

ACCUMULATION QUANTITY LIMITS

- **CESQG:**
 - $\leq 2,220$ lbs. hazardous waste, and/or
 - ≤ 2.2 lbs. acute hazardous waste
- **SQG:**
 - $\leq 13,200$ lbs. hazardous waste, and
 - ≤ 2.2 lbs. acute hazardous waste
- **LQG:**
 - No limit

ACCUMULATION TIME LIMITS

- **CESQG: No Limit**
- **SQG:**
 - 180 Days**
 - 270 Days if destination > 200 miles**
- **LQG:**
 - 90 Days**
- **Extensions can be granted**

EPA ID NUMBER REQUIRED?

- **CESQG: No (voluntary, includes fee)**
- **SQG: Yes**
- **LQG: Yes**

MANIFEST REQUIRED?

- **CESQG: No**
- **SQG: Yes (unless waste is reclaimed pursuant to 262.20(e)1)**
- **LQG: Yes**

MANIFEST COPY RETENTION

- **CESQG: None (voluntary)**
- **SQG: 3 years**
- **LQG: 3 years**

EXCEPTION REPORTING

- **Report submitted when signed manifest is not received from Treatment, Storage & Disposal Facility (TSDF)**
- **CESQG: None**
- **SQG: None, but within 60 days must submit copy of manifest with note that signed TSDF copy has not been received** ¹⁶

EXCEPTION REPORTING

- **LQG:**
 - **Must contact initial Transporter or TSDF within 35 days of shipping date**
 - **Must submit written Exception Report to NJDEP within 45 days of shipping date**

LAND DISPOSAL RESTRICTION

- **CESQG: None**
- **SQG:**
 - **Required for some waste**
 - **Must keep for 3 years**
- **LQG:**
 - **Required for some waste**
 - **Must keep for 3 years**

BIENNIAL REPORT

- **CESQG: None**

- **SQG: None**

- **LQG:**

**Submitted on each even year to report
on manifest activity from previous odd
year**

FACILITY INSPECTIONS

- **CESQG: None**
- **SQG:**
 - **Weekly for container areas**
 - **Daily/Weekly for tanks**
- **LQG:**
 - **Weekly for container areas**
 - **Daily/Bimonthly/Yearly for tanks**

TRAINING REQUIREMENTS

- **CESQG: None**
- **SQG:**
 - **Basic (waste handling familiarization and emergency procedures)**
- **LQG:**
 - **“Full” training (annual, documented, facility specific)**

PREPAREDNESS & PREVENTION

- **CESQG: None**
- **SQG:**
 - **Familiarize fire, police, hospital and have an emergency response contractor agreement**
- **LQG:**
 - **Familiarize fire, police, hospital and have an emergency response contractor agreement**

CONTINGENCY PLAN

- **CESQG: None**
- **SQG:**
 - **Post Emergency Coordinator name and number, fire department number, and location of fire extinguishers, spill control material, and fire alarm(s) near the telephone**
- **LQG: Complete Plan**

Helpful Links

- <http://www.nj.gov/dep/>
- RCRA Online
- <https://yosemite.epa.gov/osw/rcra.nsf/search1?OpenForm>